

Message Text

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ORIGIN COME-00

INFO OCT-01 EUR-12 ISO-00 DOTE-00 FEA-01 AGRE-00
CEA-01 CIAE-00 DODE-00 EB-07 FRB-01 H-02 INR-07
INT-05 L-03 LAB-04 NSAE-00 NSC-05 PA-02 EPG-02
AID-05 SS-15 STR-04 ITC-01 TRSE-00 USIA-15 PRS-01
SP-02 OMB-01 SIL-01 /098 R

DRAFTED BY COM/ BIEPR/OTP/IND/RMITCHELL
APPROVED BY EB/OT/STA:TO'HERRON
COM/OTP/IND/HBRATT
M/OPS/JWILLIAMS
COM/BDC/DBLANK
STATE/EUR/RPE/RBRESSLER
STATE/EB/OT/GWHITE
STR/HLAWRENCE
DOT/ MYER

-----151549Z 010536 /45

R 142145Z MAY 77
FM SECSTATE WASHDC
TO USMISSION EC BRUSSELS

UNCLAS STATE 110183

E.O. 11652:N/A

TAGS:EIND, EEC, ETRD

SUBJECT:EC HARMONIZATION OF INDUSTRIAL STANDARDS--PRO-
POSED COUNCIL DIRECTIVE RELATING TO TIRES FOR MOTOR VEHI-
CLES

1. THE RUBBER MANUFACTURERS ASSOCIATION (RMA) HAS CIRCULAT-
ED THE SUBJECT EC DIRECTIVE FOR REVIEW AND COMMENT BY U.S.
MANUFACTURERS. IN GENERAL IT APPEARS THAT THE DIRECTIVE
SIMPLIFIES EXISTING TYPE-APPROVAL PROCEDURES, THOUGH
POTENTIAL ADMINISTRATIVE DELAYS ARE ENVISIONED IN APPLYING
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FOR THE EEC MARK, OBTAINING APPROVAL AND STAMPING THE AP-
PROPRIATE TYPE NUMBER RECEIVED INTO THE TIRE MOLD.

2. IN AN EFFORT TO PREVENT SUCH DELAYS, IT IS RECOMMENDED
THAT ARTICLE 5 BE CLARIFIED TO ALLOW MANUFACTURER'S LAB-
ORATORIES OUTSIDE THE MEMBER STATES TO BE APPROVED TEST
LABORATORIES. IN EFFECT THIS WOULD EMULATE THE U.S. SYS-

TEM OF SELF-CERTIFICATION FOLLOWED BY CONFORMANCE CHECKING BY THE APPROPRIATE GOVERNMENT AUTHORITIES WHICH HAS SERVED THE U.S. WELL IN THE AREA OF THE TIRE SAFETY REGULATION.

3. ANOTHER PART OF THE DIRECTIVE CALLING FOR COMMENTS INVOLVES THE USE OF COLLAPSIBLE "SPACE-SAVER" TIRES AND THE

FORTHCOMING USE OF THE HIGH PRESSURE "T" TYPE TEMPORARY TIRES AS SPARES, WHICH COULD BE PROHIBITED UNDER ANNEX NINE, PARAGRAPH FOUR. WE FEEL THAT SUCH TIRES FILL AN IMPORTANT NEED TO PROVIDE ADEQUATE LUGGAGE STORAGE CAPACITY AND MINIMUM WEIGHT FOR

SMALL VEHICLES WHICH ARE BECOMING MORE COMMON. IT WOULD APPEAR THAT SPARE TIRES OF THESE TYPES WOULD ALSO HAVE AN IMPORTANT PLACE IN THE EUROPEAN INDUSTRY, PARTICULARLY AS THERE ARE NO SAFETY REASONS TO DISQUALIFY THEIR USE. ACCORDINGLY, WE RECOMMEND THAT THE DIRECTIVE BE MODIFIED TO PERMIT THE USE OF SUCH TIRES.

4. IT IS ALSO RECOMMENDED THAT THE EC IN ANNEX NINE, PARAGRAPH 2.1.2, CLARIFY THE FIRST LINE TO READ "THE COMBINED LOAD CAPACITY OF THE FOUR TIRES ON SUCH AN AXLE MUST BE AT LEAST..." WE AGREE THAT THE MAXIMUM SHOULD BE GREATER THAN 1.0 BUT DO NOT UNDERSTAND HOW THE FIGURE 1.27 WAS DERIVED.

5. MISSION IS REQUESTED TO COMMUNICATE THESE VIEWS TO THE UNCLASSIFIED

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APPROPRIATE EC OFFICIAL, REQUEST THAT THE SUGGESTED MODIFICATIONS BE MADE AND INDICATE THAT A POSITIVE RESPONSE TO THE RMA'S COMMENTS WOULD BE APPRECIATED. CHRISTOPHER

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Disposition Approved on Date:
Disposition Case Number: n/a
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Disposition History: n/a
Disposition Reason:
Disposition Remarks:
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Document Unique ID: 00
Drafter: BIEPR/OTP/IND/RMITCHELL
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Executive Order: N/A
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Film Number: D770172-0906
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Litigation History:
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